

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
SOUTHERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

Case No. 25-mj-02010DPR

GABRIEL RAMSEY,

Defendant.

MOTION FOR DETENTION

The United States of America, by and through its undersigned attorneys, respectfully requests that this Court order the detention of the defendant, Gabriel Ramsey.

In support, the United States offers the following suggestions:

1. On January 31, 2025, a complaint was filed charging the defendant with conveying a threat to injure the person of another in interstate commerce, in violation of Title 18, United States Code, Section 875(c).
2. Title 18, United States Code, Section 3142(f) provides, in pertinent part, that hearing must be held by the appropriate judicial officer to determine whether any condition or combination of conditions “will reasonably assure the appearance of such person as required and the safety of any other person and the community” if the attorney for the Government moves for such a hearing and the case involves “a crime of violence, a violation of section 1591, or an offense listed in section 2332(g)(5)(B) for which a maximum term of imprisonment of 10 years or more is prescribed.”

3. The defendant conveyed numerous threats to kill or injure federal agents via telephone and email communications.
4. The defendant has expressed suicidal ideation.
6. The defendant appears to suffer from one or more serious mental illnesses.
7. Finally, in the instant case, the evidence of the defendant's guilt is overwhelming, consisting of documentary evidence, and inculpatory statements. *See* 18 U.S.C. § 3142(g)(2).

CONCLUSION

Wherefore, based upon the foregoing, the United States submits that there is clear and convincing evidence that there are no conditions which the Court could place upon the defendant that would reasonably assure the defendant's appearance in Court and the safety of the community. The Government therefore requests that a detention hearing be held and that the defendant be detained pending trial of this matter.

Respectfully submitted,

TERESA MOORE
United States Attorney

By: /s/ James J. Kelleher
JAMES J. KELLEHER
Assistant United States Attorney

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing was delivered February 6, 2025, to the CM-ECF system of the United States District Court for the Western District of Missouri for electronic delivery to all counsel of record.

/s/ James J. Kelleher
JAMES J. KELLEHER
Assistant United States Attorney